



Purple Communications, Inc.
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October 4, 2016

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Notice of Ex Parte – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123

Dear Ms. Dortch:

On September 30, 2016, Bob Rae, President and CEO, Purple Communications Inc. (“Purple”), Michael Strecker, Vice President of Regulatory and Strategic Policy, Purple, Jarrod Musano, CEO, Convo Communications, LLC. (“Convo”) and Jeff Rosen, General Counsel, Convo met with the following staff of the Federal Communications Commission (FCC or Commission): Holly Saurer, Legal Advisor, Office of the Chairman; Nicholas Degani, Legal Advisor, Office of Commissioner Pai; Claude Aiken, Legal Advisor, Office of Commissioner Clyburn; and Johanna Thomas, Legal Advisor, Office of Commissioner Rosenworcel.

In the meetings, Purple and Convo discussed current competitive conditions in the VRS market, including the continued and potential impact of implementing dramatic VRS rate cuts on competitive providers’ viability and ability to compete effectively for market share. Although the 2013 VRS Reform Order set forth reforms intended to enable competitive



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providers to grow market share and reduce costs concurrently with the declining rates, those structural reforms have yet to be realized in the market even as rates have dropped.¹ Therefore, the need for VRS rate structure reform that will help stabilize the marketplace and the potential components of such reform were discussed.

Purple and Convo also discussed their views on various VRS-related service issues, including developing quality metrics, skills based routing and assigning iTRS phones numbers to hearing individuals who can use sign language to communicate.

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker

Vice President Regulatory and Strategic Policy

Cc: Holly Saurer
Nicholas Degani
Claude Aiken
Johanna Thomas

¹ *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 & 03-123, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82, ¶¶ 19-86 (June 10, 2013) (*2013 VRS Reform Order*).